

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

**IN RE: LOCAL TV ADVERTISING
ANTITRUST LITIGATION**

This document applies to all actions.

Master Docket No. 18-06785

MDL No. 2867

The Honorable Judge Virginia M. Kendall

**MOTION FOR LEAVE TO FILE PLAINTIFFS' MOTION TO COMPEL DEFENDANT
NEXSTAR TO PRODUCE DOCUMENTS IDENTIFIED BY CERTAIN PROPOSED
SEARCH TERMS UNDER SEAL**

Plaintiffs hereby move this Court pursuant to Local Rule 26.2 for leave to file their Motion to Compel Defendant Nexstar to Produce Documents Identified by Certain Proposed Search Terms under seal. In support, Plaintiffs state as follows:

1. Plaintiffs' Motion to Compel references certain documents produced by Defendants Nexstar, Gray Media Group LLC, Cox Media Group, LLC, and Griffin Communications, LLC in this litigation.

2. The Declaration of Nathaniel C. Giddings in Support of Plaintiffs' Motion to Compel ("Giddings Decl.") attaches as exhibits those same documents.

2. Pursuant to the Agreed Confidentiality Order, the parties are permitted to designate as "CONFIDENTIAL" all "Confidential Information," which may include: "(a) information prohibited from disclosure by statute; (b) information that reveals trade secrets; (c) research, technical, commercial or financial information that the Party has maintained as confidential; (d) medical information concerning any individual; (e) personal identity information; (f) income tax returns (including attached schedules and forms), W-2 forms and 1099 forms; or (g) personnel or employment records of a person who is not a Party to the case." ECF No. 194 at 1-2.

3. The Agreed Confidentiality Order further instructs that “[a]ny party wishing to file a document designated as Confidential Information in connection with a motion, brief or other submission to the Court must comply with Local Rule 26.2” *Id.* at 9.

4. The documents in question are designated as “CONFIDENTIAL” or “CONFIDENTIAL – ATTORNEYS’ EYES ONLY.”

5. Under Local Rule 26.2(c), “[a]ny party wishing to file a document or portion of a document electronically under seal in connection with a motion, brief or other submission must . . . move the court for leave to file the document under seal.” L.R. 26.2(c).

6. In compliance with Local Rule 26.2(c), Plaintiffs will file a public-record version of the Motion to Compel that redacts references to Confidential material and omits Confidential documents attached to the Giddings Declaration.

WHEREFORE, Plaintiffs request this Court grant them leave to file Plaintiffs’ Motion to Compel Defendant Nexstar to Produce Documents Identified by Certain Search Terms and the Declaration of Nathaniel C. Giddings in Support with exhibits thereto under seal.

Dated: September 15, 2021

Respectfully submitted,

/s/ Robert J. Wozniak
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